



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

December 14, 2010

Lisa McCarrick
56 FW/RMO,
7224 N 139th Drive
Luke Air Force Base, Arizona 85309-1420

Subject: Final Environmental Impact Statement for the Proposed Barry M. Goldwater Range East Range Enhancements, Yuma, Prima and Maricopa Counties, Arizona (CEQ # 20100454)

Dear Ms. McCarrick:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act, Council on Environmental Quality's Regulations for Implementing NEPA (40 CFR 1500-1508), and Section 309 of the Clean Air Act. Our detailed comments are enclosed.

In our letter dated September 8, 2009, we rated the Draft Environmental Impact Statement (DEIS) as Environmental Concerns – Insufficient Information (EC-2) due to our concerns regarding coordination with the nearby range and proving grounds, surface water impacts, and air emissions.

We thank the Air Force for refining the emissions estimate of particulate matter less than 10 microns (from processing sand and gravel), and the inclusion of an estimate for particulate matter less than 2.5 microns and carbon dioxide equivalent emissions. We also appreciate the clarification of the applicability of the Arizona Pollutant Discharge Elimination System Multi-Sector (stormwater) Permit, under the industrial sector of sand and gravel operations.

We remain concerned about the potential need for a permit under section 404 of the Clean Water Act for activities related to gravel excavation. We note that the FEIS does not include the U.S. Army Corps of Engineers (Army Corps) comment letter on the DEIS¹, which advised the Air Force that "some and/or all of these enhancement activities being proposed at the Barry M. Goldwater Range East may require a Department of the Army permit issued under Section 404 of the Clean Water Act." We recommend the Air Force share detailed plans with the Army Corps, to conclusively determine the need for a permit.

¹ Ron Fowler, U.S. Army Corps of Engineers. "File Number: SPL-2009-00655-RWF." Letter to Lisa McCarrick, 56 Fighter Wing, Range Management Office. Aug. 20, 2009.

We also remain concerned about the discussion of alternatives. While the FEIS describes coordination with the Marine Corps' Barry M. Goldwater West Range, and the Army's Yuma Proving grounds, it does not state that the facilities proposed in the FEIS do not exist at other nearby ranges or the proving grounds. If you have not already done so, we recommend that you verify this is the case. Additionally, we encourage close coordination in the future, to optimize the utilization of military ranges in Southern Arizona.

We appreciate the opportunity to review this FEIS. When the Record of Decision is released for public review, please send one copy to the address above (mail code: CED-2). If you have any questions, please contact me at (415) 972-3521, or contact Tom Kelly, the lead reviewer for this project. Tom can be reached at (415) 972-3852 or kelly.thomasp@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kathleen M. Goforth", with a long horizontal flourish extending to the right.

Kathleen M. Goforth, Manager
Environmental Review Office
Communities and Ecosystems Division

cc: Ronald Fowler, U.S. Army Corps of Engineers
Doug Irwin, Maricopa County Air Quality Department
Linda Taunt, Arizona Department of Environmental Quality